

1 ROBERT E. CAREY, JR., ESQ. (SBN 47556)
CAREY & CAREY
2 706 COWPER STREET
P.O. BOX 1040
3 PALO ALTO, CA 94302-1040
650/328-5510
4 650/853-3632 FAX

5 Attorneys for Defendant
JOSE BONILLA
6
7

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JOSE BONILLA,

15 Defendant.
16

CASE NO. CR-07-00251 RMW

EX PARTE APPLICATION TO
MODIFY CONDITIONS OF
RELEASE OF JOSE BONILLA
AND [proposed] ORDER THEREON

17 I, ROBERT E. CAREY, JR., declare:

18 1. I am an attorney licensed to practice law in the State of California
19 and before this Court.

20 2. I have been appointed by the Court to represent the Defendant
21 JOSE BONILLA in this matter.

22 3. JOSE BONILLA has recently completed schooling and obtained a
23 Certificate of Completion in the methodologies and strategies of counseling,
24 presented by the Latin American Institute; further, he obtained this Certificate
25 of Completion on March 31, 2009.

26 4. Mr. BONILLA has been asked by the pastor of the Apostolic
27 Assembly of the Faith in Christ Jesus Potter's House, to provide counseling at
28 the church each Monday for various youths and adults in the area of drug

addictions and mental health. This class is being offered by the church and is being sponsored by the Latin American Institute. The church is located at 113 East Front Street, Watsonville, California. The classes which will be given by the church are from 7:00 pm to 10:00 pm each Monday evening, beginning April 13, 2009. Further, Mr. BONILLA'S wife will be assisting in this counseling.

5. On April 8, 2009, I spoke with Mr. Anthony Granados. He indicated he had no objection to Mr. BONILLA'S attendance and activity at this class.

6. On April 8, 2009, I spoke with the Assistant U.S. Attorney who is in charge of this case, Mr. Thomas O'Connell; he indicated that if this request was found appropriate by the pretrial services officer, he had no objection to this request.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct, and executed on April 9, 2009, at Palo Alto, California.

/s/
ROBERT E. CAREY, JR.

ORDER

GOOD CAUSE APPEARING THEREFORE, it is hereby ordered that the conditions of pretrial release be modified so as to allow JOSE BONILLA, the Defendant in the above-referenced matter, to attend and provide counseling in drug addiction and mental health each Monday commencing April 13, 2009, from 7:00 pm to 10:00 pm, at the Apostolic Assembly of the Faith in Christ Jesus Potter's House, 113 East Front Street, Watsonville, California.

IT IS SO ORDERED.

DATED: _____, 2009

HON. PATRICIA V. TRUMBULL,
MAGISTRATE-JUDGE OF THE
UNITED STATES DISTRICT COURT